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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
OPPOSITION TO SONOS, INC.'S
MOTION FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS
PURSUANT TO PATENT L.R. 3-6**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLC representing
4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Opposition to
5 Sonos, Inc.’s (“Sonos”) Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R.
6 3-6 (Dkt. 150 (“Motion”)). If called as a witness, I could and would testify competently to the
7 information contained herein.

8 2. After the parties exchanged proposed preliminary constructions pursuant to Patent
9 Local Rule 4-2, they met and conferred “for the purposes of narrowing the issues and finalizing
10 preparation of a Joint Claim Construction and Prehearing Statement” in accordance with Patent L.R.
11 4-2(c).

12 3. In furtherance of “narrowing the issues” as prescribed by the Patent Local Rules,
13 Google provided a draft claim chart of U.S. Patent No. 9,967,615 (“615 patent”) to Sonos that
14 narrowed the term “local playback queue on a particular playback device” to “playback queue” on
15 February 3, 2022. Google essentially narrowed the issues by agreeing with Sonos that no construction
16 is necessary for the “on the particular playback device” portion of the claim term.

17 4. Attached as Exhibit 1 is a true and correct copy of an excerpt of Sonos’s January 20,
18 2022 infringement contentions.

19 5. Attached as Exhibit 2 is a true and correct copy of an excerpt of Google’s January 10,
20 2022 Patent L.R. 4-2 Preliminary Claim Constructions and Identification of Evidence.

21 6. Attached as Exhibit 3 is a true and correct copy of an excerpt of Sonos’s January 10,
22 2022 Patent L.R. Preliminary Claim Constructions and Identification of Evidence.

23 I declare under penalty of perjury that to the best of my knowledge the foregoing is true and
24 correct. Executed on March 16, 2022, in Los Angeles, California.

25 DATED: March 16, 2022

26 By: /s/ Nima Hefazi
27 Nima Hefazi
28

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(h)(3), I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

/s/ Charles K. Verhoeven

Charles K. Verhoeven